

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOR THE SIXTH DISTRICT
OF MINNESOTA**

DREAMA LARAE CHRISNER formerly
DREAMA LARAE JOHNSON,

Court File No.:

Plaintiff,

-vs-

COMPLAINT

SAPPI CLOQUET LLC,

Defendant.

Plaintiff, for her cause of action alleges and states as follows:

1. Plaintiff is an individual and current resident and citizen residing in the State of Tennessee at 602 Norris Drive, Clarksville, Tennessee 37042.

2. At all times relevant herein, Defendant Sappi Cloquet LLC is a Delaware limited liability company licensed to do business in the State of Minnesota.

3. Jurisdiction is conferred on this court based upon the diversity in citizenship of the parties and that the matter in controversy, exclusive of costs and disbursements, exceeds \$75,000.00. Therefore, jurisdiction lies under Title 28, U.S. Code Section 1332.

4. On 2/18/19, Plaintiff sustained injury at the premises of Defendant located at 2201 Ave. B., P.O. Box 511, Cloquet, MN 55720. Defendant Sappi Cloquet LLC is subject to service at its registered agent corporation service company at 2345 Rice Street, Suite 230, Roseville, MN 55113.

5. On 2/18/19, Plaintiff was lawfully on the premises of the Sappi Corporation mill at 2202 Ave. B., Cloquet, MN 55720. She was working for a security company at the time and leaving Dock Door I down a stairway. The stairway had been maintained in an unreasonably dangerous condition, without

warning of the danger to entrants., Plaintiff slipped going down the icy/slippery stairs injuring her ankle, left thigh, and left knee as well as the left shoulder, and left side. The injuries were incurred as a result of the premises being maintained in an unreasonably unsafe condition, including failure to warn.

6. As a direct result of the negligence of the Defendant in maintaining and warning of the danger of the stairway, the Plaintiff sustained grievous bodily injury and damages including, but not limited to, the following:

(a) Past and future medical expense including surgery on her left Achilles tendon on June 20, 2019 and extensive treatment thereafter for post surgical infection.

(b) The remaining injuries she sustained were temporary nature but the injury to her ankle has resulted in long term disability, scarring, and skin deterioration and delayed healing of the wound.

(c) Due to her injuries, the Plaintiff has been unable to work since the injury occurred and has sustained significant loss of earnings and future loss of earning capacity.

(d) She has sustained permanent and crippling injury to her left ankle and foot as a result of the injury including instability, swelling, skin deterioration, and prolonged failure of the surgical wound to heal properly.

(e) Past and future pain, suffering, embarrassment, and emotional trauma and distress. Part of the emotional distress is that the immobility of the ankle has caused substantial weight gain as part of the disability cascade.

(f) Her recoverable damages are in a reasonable sum in excess of \$75,000.00.

7. Plaintiff requests a jury trial in this matter.

WHEREFORE, Plaintiff, DREAMA LARAE CHRISNER prays for a judgement against the Defendant in excess of \$75,000.00 plus costs, disbursements and prejudgment interest pursuant to law.

FALSANI, BALMER, PETERSON & BALMER

Dated: 12/9/2020

By: /s/ Robert C. Falsani
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